

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29  
30  
31  
32  
33  
34  
35  
36  
37  
38  
39  
40  
41  
42  
43  
44  
45  
The Honorable John C. Coughenour  
The Honorable S. Kate Vaughan

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JOSE MEDINA CAMACHO, on behalf of  
himself and all others similarly situated,

Plaintiff,

v.

PEOPLECONNECT, INC., a Delaware  
corporation; INTELIUS LLC, a Delaware  
limited liability company; and THE  
CONTROL GROUP MEDIA COMPANY,  
LLC,

Defendants.

CASE NO. C21-1074-JCC-SKV

JOINT MOTION AND [PROPOSED]  
ORDER TO EXTEND DEADLINE FOR  
DEFENDANTS TO ANSWER OR  
OTHERWISE RESPOND TO  
PLAINTIFF'S COMPLAINT

NOTE ON MOTION CALENDAR:  
November 3, 2021

PeopleConnect, Inc., Intelius LLC, and The Control Group Media Company, LLC  
("Defendants") and Jose Medina Camacho, on behalf of himself and all others similarly situated  
("Plaintiff"), by and through their undersigned counsel, respectfully move for an extension of time  
for all Defendants to answer or otherwise respond to Plaintiff's First Amended Class Action  
Complaint such that all Defendants will answer or otherwise respond by December 27, 2021. In  
support of this Motion, the Parties state as follows:

JOINT MOTION AND [PROPOSED] ORDER TO EXTEND  
DEADLINE FOR DEFENDANTS TO ANSWER OR  
OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT - 1  
C21-1074-JCC-SKV

GORDON  
TILDEN  
THOMAS  
CORDELL  
600 University Street  
Suite 2915  
Seattle, WA 98101  
206.467.6477

1. Plaintiff filed a class action complaint against PeopleConnect, Inc. and Intelius LLC on August 11, 2021 (ECF No. 1).

2. Defendants PeopleConnect, Inc. and Intelius LLC waived service, resulting in a current date to answer or otherwise plead of 60 days from September 30, 2021, i.e., November 29, 2021 (ECF No. 17).

3. On October 28, 2021, Plaintiff filed a First Amended Class Action Complaint (“Complaint”), adding The Control Group Media Company, LLC as a Defendant (ECF No. 19).

4. On October 28, 2021, counsel for Defendants agreed to waive service for The Control Group Media Company, LLC. Given that agreement, The Control Group Media Company, LLC's date to answer or otherwise respond to Plaintiff's Complaint is December 27, 2021.

5. To reconcile the competing responsive dates, and in the interests of efficiency and judicial economy, the Parties agree that the deadline for all three Defendants to answer or otherwise respond to Plaintiff's Complaint should be on the same date, up to and including December 27, 2021.

WHEREFORE, for the reasons stated herein, the Parties respectfully request that this Court grant this Motion and enter an Order extending the deadline for all Defendants (PeopleConnect, Inc., Intelius LLC, and The Control Group Media Company, LLC) to respond to Plaintiff's Complaint up to and including December 27, 2021.

JOINT MOTION AND [PROPOSED] ORDER TO EXTEND  
DEADLINE FOR DEFENDANTS TO ANSWER OR  
OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT - 2  
C21-1074-ICC-SKY

**GORDON** 600 University Street  
**TILDEN** Suite 2915  
**THOMAS** Seattle, WA 98101  
**CORDELL** 206.467.6477

1 DATED this 3rd day of November, 2021.  
2

3 PEOPLECONNECT, INC., INTELIUS  
4 LLC, and THE CONTROL GROUP MEDIA  
5 COMPANY, LLC

6 s/ Michael Rosenberger  
7 Michael Rosenberger, WSBA #17730  
8 600 University Street, Suite 2915  
9 Seattle, Washington 98101  
10 206 467-6477  
11 mrosenberger@gordontilden.com

12 *Attorney for Defendants PeopleConnect,  
13 Inc., Intelius LLC, and The Control Group  
14 Media Company, LLC*

JOSE MEDINA CAMACHO

s/ Kim D. Stephens  
Kim D. Stephens, P.S. (WSBA # 11984)  
Cecily Jordan (WSBA # 50061)  
TOUSLEY BRAIN STEPHENS  
1200 Fifth Ave., Ste 1700  
Seattle, WA 98101  
206 682-5600  
kstephens@tousley.com  
cjordan@tousley.com

Ari J. Scharg (*pro hac vice*)  
Benjamin H. Richman (*pro hac vice*)  
Benjamin Scott Thomassen (*pro hac vice*)  
EDELSON PC  
350 N LaSalle St., 14<sup>th</sup> Floor  
Chicago, IL 60654  
312 239-3362  
ascharg@edelson.com  
brichman@edelson.com  
bthomassen@edelson.com

Kevin Abramowicz (*pro hac vice*)  
Kevin W. Tucker (*pro hac vice*)  
EAST END TRIAL GROUP LLC  
6901 Lynn Way, Ste 215  
Pittsburgh, PA 15208  
412 223-5740  
kabramowicz@eastendtrialgroup.com  
ktucker@eastendtrialgroup.com

33 *Attorneys for Plaintiff Jose Medina Camacho*  
34  
35

36 IT IS SO ORDERED.  
37

  
\_\_\_\_\_  
S. KATE VAUGHAN

40 United States Magistrate Judge  
41  
42

43 DATE: 4th day of November, 2021  
44  
45